

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

)
)
)
) MDL No. 2419
) Dkt. No 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO:

)
)
) Suits Naming the Tennessee Clinic
) Defendants
)

NOTICE OF FILING OF AMENDED DEPOSITION NOTICES

Defendants Saint Thomas Outpatient Neurosurgical Center, LLC; Howell Allen Clinic, a Professional Corporation; John Culclasure, MD; Debra Schamberg, RN, CNOR; Vaughan Allen, MD; Specialty Surgery Center, Crossville, PLLC; Kenneth R. Lister, MD; Kenneth Lister, MD, PC; and Donald E. Jones, MD (collectively "Tennessee Clinic Defendants") give notice to the Court and to all parties of the filing of the following amended deposition notices:

1. The deposition of Cory Fletcher will begin at 10:00 am (EST) on November 9, 2015. The deposition will occur at the law offices of Nutter, McClennen & Fish, LLP, Seaport West, 155 Seaport Blvd., Boston MA 02210. An amended notice of deposition is attached as Exhibit 1.

2. The deposition of Owen Finnegan will occur on November 9, 2015, and will begin at the conclusion of the deposition of Mr. Haynes (approximately 1:00 pm (EST)). The deposition will occur at the law offices of Nutter, McClennen & Fish, LLP,

Seaport West, 155 Seaport Blvd., Boston MA 02210. An amended notice of deposition is attached as Exhibit 2.

3. The deposition of Steven Haynes will occur on November 9, 2015 and will begin at the conclusion of the deposition of Mr. Finnegan (approximately 3:00 pm (EST)). The deposition will occur at the law offices of Nutter, McClennen & Fish, LLP, Seaport West, 155 Seaport Blvd., Boston MA 02210. A notice of deposition is attached as Exhibit 3.

4. The deposition of witness Mario Giamei will begin at 8:00 am (EST) on November 12, 2015. The deposition will occur at the law offices of Nutter, McClennen & Fish, LLP, Seaport West, 155 Seaport Blvd., Boston MA 02210. A notice of deposition is attached as Exhibit 4.

Respectfully submitted,

GIDEON, COOPER & ESSARY, PLC

/s/ Chris J. Tardio

C.J. Gideon, Jr.*

Chris J. Tardio*

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***Attorneys for the Tennessee Clinic
Defendants***

* Admitted pursuant to MDL Order No. 1.

** Admitted *pro hac vice*.

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing and copies will be e-mailed or mailed via regular U.S. mail to those participants identified as unregistered this 4th day of November, 2015.

/s/ Chris J. Tardio

Chris J. Tardio

EXHIBIT 1

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**IN RE NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION**

THIS DOCUMENT RELATES TO:

All Cases

MDL No. 2419
Dkt. No 1:13-md-2419 (RWZ)

Amended Notice of Deposition

Defendants Saint Thomas Outpatient Neurosurgical Center, LLC; Howell Allen Clinic, a Professional Corporation; John Culclasure, MD; Debra Schamberg, RN, CNOR; Vaughan Allen, MD; Specialty Surgery Center, Crossville, PLLC; Kenneth R. Lister, MD; Kenneth Lister, MD, PC; and Donald E. Jones, MD (collectively "Tennessee Clinic Defendants"), pursuant to Federal Rule of Civil Procedure 30, come now and give notice that the oral and videotaped deposition of Cory Fletcher will be taken on November 9, 2015, beginning at 10:00 am (EST) and continuing until completed.

The deposition will take place at Nutter, McClennen & Fish, LLP, Seaport West, 155 Seaport Blvd., Boston, MA 02210. The deposition will be recorded by stenographic means and by video.

Respectfully submitted,

GIDEON, COOPER & ESSARY, PLC

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Chris J. Tardio

EXHIBIT 2

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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The deposition will take place at Nutter, McClennen & Fish, LLP, Seaport West, 155 Seaport Blvd., Boston, MA 02210. The deposition will be recorded by stenographic means and by video.

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EXHIBIT 3

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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The deposition will take place at Nutter, McClennen & Fish, LLP, Seaport West, 155 Seaport Blvd., Boston, MA 02210. The deposition will be recorded by stenographic means and by video.

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EXHIBIT 4

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The deposition will take place at Nutter, McClennen & Fish, LLP, Seaport West, 155 Seaport Blvd., Boston, MA 02210. The deposition will be recorded by stenographic means and by video.

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